ESTTA Tracking number:

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Filing date:

02/14/2019

# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91245759
Party	Defendant Zoetop Business Co., Limited
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Sophia J. Shin
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Signature	/Sophia Shin/
Date	02/14/2019
Attachments	SHEIN.SCHEIN Opp. No. 91245759 - Joint Motion for Ext of Time.pdf(137891 bytes)

### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

SCHEIN ORTHOPÄDIE SERVICE KG,

Opposition No. 91245759

Application No.: 87857183

Opposer,

Mark: SHEIN

v.

Filing Date: March 30, 2018

ZOETOP BUSINESS CO., LIMITED

Applicant.

## MOTION TO EXTEND PRE-TRIAL AND TRIAL DEADLINES

Opposer Schein Orthopädie Service KG ("Opposer") and Applicant ("Zoetop Business Co., Limited") hereby submit this Joint Motion to Extend Pre-trial and Trial deadlines under Fed. R. Civ. P. 6(b); 37 C.F.R. §2.116(a); and T.B.M.P. § 509.

The parties have been actively involved in efforts to resolve the opposition and have engaged in several settlement discussions. The parties hope to resolve the matter in the next sixty (60) days.

Therefore, the parties respectfully request that all pretrial and trial dates be extended by 60 days (as shown below) so that the parties can devote their time and resources to settling the cases.

Time to Answer	April 20, 2019
Deadline for Discovery Conference	May 20, 2019
Discovery Opens	May 20, 2019
Initial Disclosures Due	June 19, 2019
Expert Disclosures Due	October 17, 2019
Discovery Closes	November 16, 2019
Plaintiff's Pretrial Disclosures Due	December 31, 2019
Plaintiff's 30-day Trial Period Ends	February 14, 2020

Defendant's Pretrial Disclosures Due	February 29, 2020
Defendant's 30-day Trial Period Ends	April 14, 2020
Plaintiff's Rebuttal Disclosures Due	April 29, 2020
Plaintiff's 15-day Rebuttal Period Ends	May 29, 2020
Plaintiff's Opening Brief Due	July 28, 2020
Defendant's Brief Due	August 27, 2020
Plaintiff's Reply Brief Due	September 11, 2020
Request for Oral Hearing (optional) Due	September 21, 2020

# Respectfully submitted on February 14, 2019.

#### GREENBERG TRAURIG LLP

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# **CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing Joint Motion to Extend Pre-Trial and Trial Deadlines was served by e-mail and first-class mail on February 14, 2019, upon counsel for Opposer at the following address of record:

Stewart J. Bellus Collard & Roe P.C. 1077 Northern Blvd. Roslyn, NY 11576 Telephone: 516-365-9802

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